

1 **COLLEEN HARRINGTON**
2 10429 Armand Ave.
3 Las Vegas, Nevada 89129
4 Tel: (702) 204-6948
 E-mail: CH302@aol.com
Plaintiff

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MAR 1 U 2020

CLERK US DISTRICT COURT
DISTRICT OF NEVADA
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**COLLEEN HARRINGTON, AN
INDIVIDUAL.**

Case No.: 2:18-cv-00009-APG-BNW

Plaintiff,

HEARING DATE CHANGE

VS.

STATE OF NEVADA, EX REL. NEVADA
SYSTEM OF HIGHER EDUCATION,
COLLEGE OF SOUTHERN NEVADA, DOES
I-X.

Defendant

COMES NOW, Plaintiff Colleen Harrington (or "Plaintiff"), appearing pro se, submits this request for changing the April 3, 2020 hearing to any date before April 1 or after April 12, 2020.

3) This Request will address three points: 1) Plaintiff 's request to change hearing date due to unavailability 2) Original request for continuance and 3) Demand for prior discovery.

POINTS

1) Plaintiff's request to change hearing date due to unavailability

The Plaintiff is unavailable April 2 to April 12, 2020. Plaintiff has attempted to meet and confer with previous and current defense counsel to no avail. Plaintiff contacted Mr. Hinckley on February 15, 2020, after receiving the notice of hearing date. Plaintiff then contacted the Judge's

1 office for potential dates on February 18 and was provided possible dates of February 28 and
2 March 3. Plaintiff presented these options to Mr. Hinckley on February 18; however, he was
3 unavailable on those dates. Since Mr. James Martines has taken over as defense counsel Plaintiff
4 sent an email and called his office on March 4, 2020. CSN General Counsel Specialist responded
5 (see attached email) there was not an objection to postpone the hearing until the week of April
6 13th. April 2-12, 2020 are the only dates in 2020 the Plaintiff is unavailable.
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8 2) Original request for continuance

9 Plaintiff requested the original time extension to encompass the Response to the Motion for
10 Summary Judgement, as well as other case related actions on February 3, 2020. No response was
11 received so Plaintiff was forced to file the Response to the Motion for Summary Judgement on
12 February 12, 2020, the deadline. After filing the response this hearing was set, negating one issue
13 for the hearing.

14 3) Demand for Prior Discovery

15 The parties who failed to comply with responding to discovery requests and file a modified
16 Stipulated Discovery Plan and Scheduling Order, Richard Hinckley and Jenny Foley, are no
17 longer attached to this case and should be present for the hearing to provide explanations for the
18 lack of discovery.

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1 For the foregoing reasons, Plaintiff respectfully requests the Court change the date of this
2 hearing.

3 DATED: March 10, 2020.
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6 Plaintiff name
7 Colleen Harrington
8 10429 Armand Avenue
9 Las Vegas, Nevada 89129
10 Tel: (702) 204-6948

11 IT IS ORDERED that ECF No. 59 is
12 GRANTED. The hearing previously
13 scheduled for 4/3/2020 is rescheduled
14 to 4/16/2020 at 9:00 a.m. in courtroom
15 3B.

16 **IT IS SO ORDERED**

17 DATED: March 11, 2020



18 **BRENDA WEKSLER**
19 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of March, 2020, I caused to be served a true and correct copy of the foregoing CERTIFICATE OF SERVICE on the following persons as follows:

This envelope was addressed to:

James J. Martines, Nevada System of Higher Education, 4300 S. Maryland Parkway, Las Vegas, NV 89119.

X by placing the same for mailing in the United States Mail, in a sealed envelope on which first class postage was prepaid in Las Vegas, Nevada.

/s/

**Colleen Harrington
Plaintiff**

Harrington v. CSN - Request for April 3rd date change

Knoblach, Stephanie <Stephanie.Knoblach@CSN.EDU>

Tue 3/10/2020 9:46 AM

To: Harrington, Colleen <Colleen.Harrington@CSN.EDU>

Cc: James Martines <jmartines@nshe.nevada.edu>; Cindy Hunt <chunt@nshe.nevada.edu>

Ms. Harrington,

Mr. Martines has reviewed your request for a change of hearing date in the above-referenced case. CSN will not object to moving the hearing to the week of April 13th.

Thank you,

Stephanie Knoblach

Sr. Specialist

Office of General Counsel

College of Southern Nevada

6375 W. Charleston Blvd. (WCE310)

Las Vegas, Nevada 89146

(702) 651-7488